

EXHIBIT 6

1
2
3
4
5
6
7
8 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
IN AND FOR THE COUNTY OF [COUNTY]

9 In Re:
10 **GEO Secure Services LLC**
11 **1623 East J Street**
Tacoma, WA 98421

NO. _____

DECLARATION OF SUPPORT FOR
ENTRY WARRANT.

12 **INSPECTION 317977630**
13 _____

14 1. I, Eric Smith, am an authorized representative of the Director of the Department
15 of Labor & Industries (Department), employed as a Region 3 Compliance Safety and Health
16 Officer under the Washington Industrial Safety and Health Act, ch. 49.17 RCW (WISHA). I am
17 over the age of 18 and am competent to testify herein. Eric Smith is a pseudonym used in the
18 course of my inspections with the Department for my personal safety. My legal name is Eric
19 Arroyo. I make these statements on personal knowledge and belief.

20 2. I make this declaration in support of the Department's Application for WISHA
21 Safety and Health Inspection Entry Warrant. More specifically, the Department requests
22 issuance of an inspection entry warrant permitting an inspection of the **GEO Secure Services**
23 **LLC** jobsite located at 1623 East J Street, Tacoma WA 98421 to determine compliance with the
24 safety and health standards promulgated under WISHA.
25

DECLARATION OF
SUPPORT FOR ENTRY
WARRANT

1

WASHINGTON STATE DEPARTMENT OF
LABOR & INDUSTRIES
950 Broadway, Suite 200, Tacoma, WA 98402

3. This entry warrant request is pursuant to RCW 49.17.070, RCW 49.17.075 and RCW 70.395 and is:

- ☒ 1. A routine programmed inspection of an identified hazardous workplace, which is a private detention facility.
- ☐ 2. An unprogrammed inspection of a workplace based upon a complaint/referral from a person who reasonably believes workers are or have been exposed to a hazard because of a violation.
- ☐ 3. An investigation of a workplace death, serious injury or illness to determine whether it was caused by a violation of safety or health rules or Chapter 49.17 RCW, Washington Industrial Safety and Health Act.
- ☐ 4. An inspection of a workplace where the Department of Labor & Industries has reason to believe that employees may be in imminent danger of serious injury or death.
- ☐ 5. A follow up inspection to verify whether the employer has abated any hazards for which the employer has been previously cited.

The facts establishing grounds for issuance of an entry warrant are:

On May 11, 2023, Washington State Legislature passed RCW 70.395, An Act Relating to Private Detention Facilities. RCW 70.395.050 (4) provides:

Inspections-Delegation-Rules-Enforcement

(4) The Department of Labor and Industries shall conduct routine, unannounced inspections of workplace conditions at private detention facilities, including work undertaken by detained persons.

For private detention facilities, RCW 70.395.050 adds a routine, unannounced, inspection requirement of workplace conditions for work undertaken by detained persons. This will be the first inspection conducted pursuant to RCW 70.395.050 (4).

DECLARATION OF
SUPPORT FOR ENTRY
WARRANT

2

WASHINGTON STATE DEPARTMENT OF
LABOR & INDUSTRIES
950 Broadway, Suite 200, Tacoma, WA 98402

On December 27, 2023, Matt Williams and I entered the GEO Secure Services LLC., ICE Detention facility in Tacoma to open a comprehensive workplace safety and health inspection to enforce the new RCW 70.395 regulations. After waiting in the lobby for approximately 20 minutes, the Facility Administrator, Bruce Scott, and another individual from management greeted us and asked why we were there. Matt and I explained we were from WA L&I and we are here to open a comprehensive workplace safety and health inspection. When we asked for permission to be on the premises and conduct a comprehensive workplace safety and health inspection, Bruce Scott said before he gives us permission he will have to make a phone call and asked us to continue to wait in the lobby. After returning to the lobby, Bruce Scott said "ICE has directed us to not allow you entry today." We read to Mr. Scott the denial of entry statement on the WISHA 1A form, marked the date and time of denial of entry, and left the facility.

I certify, under penalty of perjury under the laws of the State of Washington that the above is true and correct to the best of my knowledge.

Date: 12/29/2023

Place: 950 Broadway, Suite 220, Tacoma, WA 98402

Name: Eric Smith

DECLARATION OF
SUPPORT FOR ENTRY
WARRANT

3

WASHINGTON STATE DEPARTMENT OF
LABOR & INDUSTRIES
950 Broadway, Suite 200, Tacoma, WA 98402